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May 21, 2025

VIA ECF

Honorable Katherine Polk Failla
United States District Court
Southern District of New York
40 Foley Square
New York, NY 10007

MEMO ENDORSED

Re: Elizabeth Valdez v. Go Broome LLC, et al.
Civil Action No. 25-CV-960 (KPF) (KHP)

Dear Judge Failla:

My firm represents defendants GO Broome, LLC and Gotham Real Estate Managers, LLC in the above-referenced matter. I am writing on behalf of all defendants pursuant to Your Honor's individual rules to request an extension of time to respond to the complaint up to and including July 18, 2025. This is GO Broome's second request for an extension and Gotham's third request. This is also the third request defendants, the City of New York and the Department of Housing Preservation and Development of the City of New York. Plaintiff's counsel consents to this request. The reason for the request is that there have been some very recent¹ settlement discussions among counsel who wish to explore a possible resolution before engaging in costly litigation. Defendants also request that the initial case management conference and associated filings to be adjourned accordingly. Thank you for your consideration.

Respectfully submitted,

RIVKIN RADLER LLP

A handwritten signature in cursive script, appearing to read 'Bruno', written in black ink.

Jonathan B. Bruno

cc: Counsel of Record via ECF

¹ Defendants were served with a settlement demand on May 15.

Application GRANTED. The deadline for all Defendants to answer, move, or otherwise respond to the Complaint is hereby ADJOURNED to **July 18, 2025**.

Moreover, the initial pretrial conference currently scheduled for June 10, 2025, is hereby ADJOURNED *sine die*. The Court will reschedule this conference (as needed) once Defendants have answered the Complaint.

The Clerk of Court is directed to terminate the pending motion at docket entry 27.

Dated: May 22, 2025
New York, New York

SO ORDERED.

A handwritten signature in blue ink, reading "Katherine Polk Failla".

HON. KATHERINE POLK FAILLA
UNITED STATES DISTRICT JUDGE